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August 7, 2019

Via ECF:

Hon. Analisa Torres
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: **Jasmine Norman v. NYU Langone Health System**
Docket No.: 19-CV-00067 (AT)

Your Honor:

This office represents Plaintiff in the above referenced matter. The parties write jointly to respectfully request an extension of fact discovery (currently set to close on September 3, 2019) to run concurrent with expert discovery (set to close on October 18, 2019). Contemporaneously, the parties jointly request that: the next Case Management Conference currently scheduled for September 19, 2019 at 3:00pm be adjourned until a date and time convenient to the Court following the close of all discovery on October 18, 2019; and that the date for the parties to request a pre-motion conference regarding dispositive motion practice be extended until 14 days after the close of all discovery as noted in the Case Management Plan 7(b) Dkt. No. 25. This is the parties first request to extend fact discovery, adjourn the Case Management Conference, and the time to file a pre-motion conference letter regarding summary judgment.

By way of background, Plaintiff alleges, *inter alia*, violations of the ADA and corresponding NYS and NYC law. The parties have been working cooperatively and exchanged paper discovery pursuant to the Discovery Protocols outlined in the Second Amended Standing Administrative Order M10-468; exchanged interrogatory and document responses consisting of over 2000 pages of discovery productions; exchanged medical records; participated in mediation; conferred regarding settlement post mediation; conferred regarding expert discovery and plan to continue those conferrals this week; and conferred regarding setting a deposition schedule.

The reason for the request is due, in part, to counsel's conflicting schedules in August¹, which makes it difficult to complete depositions and follow up discovery during that time. Should Your Honor grant this request, the parties will complete fact discovery concurrent with any anticipated expert discovery.

Accordingly, the parties jointly respectfully request: that fact and expert discovery close on

¹ The undersigned plans to be on vacation during the week of August 26, 2019.

October 18, 2019; an adjournment of the Case Management Conference until a date and time convenient to the Court following the close of all discovery; and an extension of time to file pre-motion conference letters in accordance with Case Management Plan 7(b) Dkt. No. 25 until after the close of all discovery.

The parties thank the Court for its time and attention to the herein matters.

Respectfully,
PHILLIPS & ASSOCIATES

/s/

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